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Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

EB Docket No. 06-36 EB-06-TC-060

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

Wilkes Cellular, Inc. 499 Filer ID 806702 Wilkes Communications, Inc. 806701 Wilkes Tel. & Elec. Co. Inc. 806700

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the <u>attached CPNI Certification</u> together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan

JSI Staff Director-Regulatory Affairs

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sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary

Byron McCoy, Telecommunications Consumers Division

Best Copy and Printing (BCPI)

No. of Copies recid On #

Wilkes Cellular, Inc. 499 Filer ID 806702 Wilkes Communications, Inc. Filer ID 806701 Wilkes Telephone & Electric Company 499 Filer ID 806700 P.O. Box 277, 11 Court St., Washington, GA 30673 (706) 678-2121

CERTIFICATION

I am George A. Dyson, President of Dycom Holdings, Inc., parent company of the Wilkes telecommunications providers listed above (collectively "Wilkes Companies"). On behalf of the Wilkes Companies, I hereby certify that I have personal knowledge that the Wilkes Companies are in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules. Accompanying this certificate is a statement explaining how the Wilkes Companies are in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Name: George A Dyson

Title: President

Dycom Holdings, Inc.

February 2, 2006

Attachment

⁴⁷ C.F.R. §§ 64.2001-2009.

Wilkes Cellular, Inc. 499 Filer ID 806702 Wilkes Communications, Inc. Filer ID 806701 Wilkes Tel. & Elec. Co. Inc. Filer ID 806700

P.O. Box 277, 11 Court St., Washington, GA 30673 (706) 678-2355

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how the above listed telecommunications providers operating in Georgia, all subsidiaries of Dycom Holdings, Inc. (collectively "the Company" or "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has informed employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

2. Customer Notification and Authorization Process

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the Section 64.2007(f)(2).

3. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

4. Record Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

5. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.